

REED SMITH LLP

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*Attorneys for The Ad Hoc Group of
Actual Wallet Holders*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

BLOCKFI INC., *et al.*,¹

Debtors.

Chapter 11

22-19361 (MBK)

(Jointly Administered)

**ENTRY OF APPEARANCE AND REQUEST FOR
NOTICES OF THE AD HOC GROUP OF ACTUAL WALLET HOLDERS PURSUANT
TO FED. R. BANKR. P. 2002 AND 9010 AND N.J. BANKR. L.R. 9010-1(3)**

PLEASE TAKE NOTICE THAT, pursuant to Rules 2002(g) and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), section 1109(b) of title 11 of the United States Code, 11 U.S.C. § 101 *et seq.* (the “Bankruptcy Code”), and Rule 9010-1(3) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of New Jersey, the attorney listed below enters his appearance for The Ad Hoc Group of Actual Wallet Holders, consisting of (i) BCF 2020 Investments, LLC; (ii) BMB 2020 Investments, LLC;

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors’ service address is 201 Montgomery Street, Suite 263, Jersey City, NJ 07302.

(iii) Brent Pratt; (iv) Bryant Foulger; (v) Clayton Foulger; (vi) FP Equity Investments, LLC; and (vii) Scott Foulger (collectively, the “Actual Wallet Holders”) and requests that the Actual Wallet Holders be added to the official mailing matrix and service lists in this case and that copies of all pleadings, motions, notices, and other papers, filed or served, in this case or any proceeding herein, be served upon the below-listed counsel at the following mailing address or both of the below e-mail addresses:

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PLEASE TAKE FURTHER NOTICE THAT, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the above-mentioned Bankruptcy Rules, but also includes, without limitation, all orders and notices of applications, motions, petitions, pleadings, requests, complaints, disclosure statements, plans, or demands, whether formal or informal, written or oral or transmitted or conveyed by mail delivery, telephone, telegraph, or otherwise, in this case.

This Notice of Appearance and any subsequent appearance, pleading, claim, or suit are not intended as, nor shall be deemed, a consent to or waiver of the Actual Wallet Holders’ (i) right to have final orders in non-core matters entered only after *de novo* review by a district judge; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy, or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claim, actions, defenses, setoffs, or recoupments to which the Actual Wallet Holders (is or may be entitled under any

agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are reserved.

Respectfully submitted,

Dated: May 3, 2023

By: /s/ Kurt F. Gwynne
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